

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

CHILLY DIL CONSULTING INC., a Florida corporation, §
§
Plaintiff, §
§
V. § **CIVIL ACTION NO. 3:14-cv-02749-P**
§
JETPAY ISO SERVICES, LLC, a Texas limited liability company; JETPAY, LLC, a Texas limited liability company; JETPAY CORPORATION, a Delaware corporation; and TRENT R VOIGT, an individual, §
§
Defendants. §

APPENDIX OF EVIDENCE IN SUPPORT OF PLAINTIFF'S UNOPPOSED MOTION TO EXTEND DEADLINE FOR DESIGNATION OF EXPERT WITNESSES AND REBUTTABLE EXPERT WITNESSES

Pursuant to Civil Local Rules of Northern District of Texas Local Rule 7-1, Plaintiff, CHILLY DIL CONSULTING INC., ("Plaintiff") hereby submits this Appendix of Evidence in support of Plaintiff's Unopposed Motion to Extend the Deadlines for Designation of Expert Witnesses and Designation of Rebuttable Expert Witnesses.

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EXHIBIT A

**THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**CHILLY DIL CONSULTING INC., a
Florida corporation,**

Plaintiff,

V.

CIVIL ACTION NO. 3:14-cv-02749-P

JETPAY ISO SERVICES, LLC, a Texas limited liability company; JETPAY, LLC, a Texas limited liability company; JETPAY CORPORATION, a Delaware corporation; and TRENT R VOIGT, an individual,

Defendants.

**AGREED STIPULATION TO EXTEND DEADLINE FOR DESIGNATION OF EXPERT
WITNESSES AND REBUTTABLE EXPERT WITNESSES**

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

COMES NOW, Plaintiff Chilly Dil Consulting, Inc. (“Plaintiff”) and Defendants JetPay ISO Services, LLC; JetPay, LLC; JetPay Corporation; and Trent R. Voight (collectively, “Defendants”) hereby stipulate to extend the deadlines for designation of expert witnesses and designation of rebuttal expert witnesses as set forth in the January 6, 2015 Scheduling Order.

1. On January 6, 2015, the Court issued the Scheduling Order which set the deadline for a party with the burden of proof on a claim to designate expert witnesses as September 4, 2015, and the deadline for designation of rebuttal expert witnesses as October 4, 2015.

2. Plaintiff and Defendants have conferred and have agreed to extend the deadline to designate expert witnesses and rebuttal expert witnesses to October 5, 2015 and November 4, 2015, respectively.

3. Good cause exists to approve the stipulation as the parties have conducted only limited discovery thus far, as the Court has only recently granted Plaintiff’s Motion for Protective Order, thus allowing production of some documents and information subject to that Order to be exchanged, and there are pending motions before the court to compel discovery responses. Due to the lack of discovery materials exchanged, it is difficult for Plaintiff to determine which experts to designate before the current September 4, 2015 deadline.

4. Further, the Parties will not be prejudiced by the extensions requested.

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PRAYER

Accordingly, Plaintiff and Defendants respectfully request that the Court approve this agreed stipulation to extend the deadlines to designate expert witnesses and rebuttal expert witnesses to October 5, 2015 and November 4, 2015, respectively.

Respectfully submitted,

David Steiner & Associates, PLC

BY: _____ /s/

David Paul Steiner

David Steiner & Associates, PLC

Attorneys for Plaintiff

LEHTOLA & CANNATTI PLLC

BY: _____ /s/

Patricia Beaujean Lehtola

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- AND -

COOPER & SCULLY, P.C.

BY: _____ /s/

Timothy Micah Dortch

COOPER & SCULLY, P.C.

Attorney for Defendants

CERTIFICATE OF SERVICE

This is to certify that on September 3, 2015, the foregoing was served upon counsel of record in accordance with the Federal Rules of Civil Procedure as set forth below by U.S. Mail or electronic filing.

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